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July 11, 2012

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New 11201

Re: *United States v. Gerardo P. Fusella*
Criminal Docket No. 11-844 (KAM)

Dear Judge Matsumoto:

With the consent of The Government and Pre-Trial Services, it is respectfully requested that The Court modify the bail conditions of defendant Gerardo P. Fusella.

Among other conditions, defendant's current bail conditions require:

- 1). Electronic monitoring by wearing an "ankle bracelet";
- 2). A seven day per week curfew of 9:00 P.M. until 5:00 A.M. at defendant's home at 3 Andover Lane, East Hanover, New Jersey.

The proposed new bail conditions include:

- 1). The replacement of electronic monitoring via an ankle bracelet with monitoring via *the voice verification system*.
- 2). Permission for defendant to stay at his parents home at 9907 Seapointe Blvd. Unit 3123, Wildwood Crest, New Jersey Friday and Saturday nights thru Labor Day Weekend. The curfew to remain in effect but without electronic monitoring.

Mr. Fusella will be required to notify Pre-Trial Services 48 hours in advance whether he will be at his parent's home on The New Jersey Shore for the weekend or at his primary residence. Mr. Fusella will provide landline phone numbers for both locations so that the *voice verification system* can be put into effect.

All other conditions of bail imposed in The Court's order dated March 29, 2012 are to remain in full force and effect.

Respectfully submitted,

S/Stuart Rubin
Stuart D. Rubin

Cc: A.U.S.A. Whitman G.S. Knapp